Postal Rate Commission Submitted 8/4/2006 1:59 pm Filing ID: 51918 Accepted 8/4/2006

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0111

POSTAL RATE AND FEES CHANGES, 2006	Docket No. R2006-1

FOLLOW-UP INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION TO UNITED STATES POSTAL SERVICE WITNESS JAMES M. KIEFER (PSA/USPS-T37-13)

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following follow-up interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

Timothy J. May Patton Boggs, LLP 2550 M Street, NW Washington, DC 20037 Tel: 202 457 6050

Fax: 202 457 6315 tmay@pattonboggs.com

Counsel for Parcel Shippers Association

Dated: August 4, 2006

PSA/USPS-T37-13. Please refer to your response to PSA/USPS-T36-8 and your workpaper WP-PP-29. Please confirm that in your calculation of the average revenue of PRS pieces, if mailed as Intra-BMC parcels, the denominator should have used the PRS TYBR volume.

4821867 2